

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-39

Respondent: Bruce Lear
Title: Senior Specialist

REQUEST: AT&T Communications of New England & Covad
Communications, Inc., Set #1

DATED: June 6, 2001

ITEM: ATT/Covad 1-11 Identify any and all occasions in which CLECs “have blown fuses within their collocation arrangements,” as stated on page 11 of Verizon’s Answer; with respect to each such incident, identify the name of the CLECs, the collocation site, the amount of load amps requested by the CLEC, the amount of amps provided, and the fuse capacity of the feed; provide copies of any and all related incident reports and describe any evidence of equipment malfunction causing the blown fuse(s).

REPLY: The Company objects to the request for identification of any and all occasions in which CLECs have blown fuses being overly burdensome. The request would require Verizon to review maintenance records for each of its central office buildings for multiple years and canvas all of the Operations Teams responsible for monitoring and maintaining DC Power throughout its footprint, since records may not exist for all occasions when a blown fuse is replaced.

Subject to the foregoing objection and without waiving it, Verizon states that the following represents an example where a CLEC’s power distribution was interrupted due to blown fuses. The generic term “CLEC” is used in place of the actual CLECs name in the writeup. The information was extracted from notes made by a Verizon employee regarding a power problem in a Lancaster PA central office.

“Due to the operation of the two 60 amp fuses that supply the CLEC cage at the Lancaster, PA C.O., the corresponding power

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con't.

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feeders were thoroughly inspected by Lucent and our local Operations people on Feb. 12, 2000. No evidence of any arcing or faults at our BDFB fuse holders, along the entire cable rack or at the CLEC cage could be found. Therefore it can only be concluded that the problem was triggered by either a fuse

“Due to the operation of the two 60 amp fuses that supply the CLEC cage at the Lancaster, PA C.O., the corresponding power feeders were thoroughly inspected by Lucent and our local Operations people on Feb. 12, 2000. No evidence of any arcing or faults at our BDFB fuse holders, along the entire cable rack or at the CLEC cage could be found. Therefore it can only be concluded that the problem was triggered by either a fuse

The Lucent power installers who performed this inspection further reported that the CLEC had connected two 30 amp circuits in parallel to the existing 60 amp circuits on the night of the inspection in an effort to increase the capacity. The use of fuses in parallel is NOT PERMITTED in accordance with BAP 790-600-500, para 3.5 and the National Electric Code, Article 240-8. It can present a potential fire hazard. If this in fact is the situation, I recommend that you should have CLEC disconnect the parallel circuits immediately and expedite the new, larger power circuits. ”

VZ # 11

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Respondent: Lynelle J. Reney
Title: Director

REQUEST: AT&T Communications of New England & Covad
Communications, Inc., Set #1

DATED: June 6, 2001

ITEM: ATT/Covad 1-19 Referring to the attached list of collocation sites occupied by
AT&T and Covad (Attachment A to this First Set of Information
Requests),

- a) Please state whether Verizon agrees or disagrees that this list identifies each and every collocation site subject to the terms of the intrastate tariff;
- b) If Verizon believes that certain collocation sites listed in Attachment A are not subject to terms of the intrastate tariff, please identify each and every such collocation site;
- c) If Verizon believes that additional collocation sites not listed in Attachment A are subject to the intrastate tariff, please identify each and every such collocation site;
- d) For each collocation site listed in Attachment A and any additional sites identified in Verizon's response to Information Request No. 19(c), identify the first effective date on which Verizon deemed the site subject to and for which AT&T was assessed charges for DC power;
- e) For each collocation site listed in Attachment A and any additional sites identified in response to Information Request No. 19(c), identify the type of collocation (traditional physical or virtual);

- f) For each collocation site listed in Attachment A and any additional sites identified in response to Information Request No. 19(c), state the number of square feet provided;
- g) Identify the number of feeds provided at each site listed in Attachment A and at any additional sites identified in Verizon's response to Information Request No. 19(c). For purposes of this Information Request No. 19, a "feed" is defined as a single line feed, not a feed pair, (in the terms of the Collocation Application, an A or a B feed, but not an A and B feed pair), If this number has changed between the first effective dates of charging for DC power identified in Information Request No. 19(d) and the filing of the Complaint in this proceeding, identify how and when such change(s) occurred;
- h) Identify the fused amp capacity delivered by means of each feed identified in Information Request No. 19(g). If this number has changed between the first effective dates of charging for DC power identified in Information Request No. 19(d) and the filing date of the Complaint in this proceeding, identify how and when such change(s) occurred;
- i) Identify the maximum load amp capacity for which each feed identified in Information Request No. 19(g) was designed. If this number has changed between the first effective dates of charging for DC power identified in Information Request No. 19(d) and the filing date of the Complaint in this proceeding, identify how and when such change(s) occurred;
- j) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), identify the total load amps that Verizon is able to deliver through the total number of feeds provisioned;
- k) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), identify the total load amps that AT&T equipment located at such site is capable of drawing;

- l) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), provide copies of each and every bill for DC Power charges from the first effective date as identified in Information Request No. 19(d) until the filing date of the Complaint in this proceeding;
- m) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), provide copies of Collocation Applications, including any and all application amendments and other correspondence relating to DC power requirements as requested by AT&T;
- n) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), identify what Verizon contends is the amount of DC load amps requested, ordered, or applied for by AT&T at each site;
- o) If Verizon contends that unwritten communications have occurred that affect the amount of amps or number of feeds at any of the collocation sites listed in Attachment A or otherwise identified in Information Request No. 19(c), please identify the Verizon and AT&T individual personnel who have had such conversations, the substance of the conversations, the approximate date of such conversations and how these conversations relate to the DC power requirements requested or provided at each site;
- p) If Verizon is aware of occasions in which AT&T representatives explained to Verizon representatives the power requirements of any collocation site listed in Attachment A or of any additional sites identified in Verizon's response to Information Request No. 19(c), please identify such occasions, including dates, Verizon and AT&T representatives involved, and the substance of such explanations;
- q) Provide the tariff language, including the dates in which the tariff containing such language was filed and approved, that Verizon contends applies to billing for DC Power at each collocation site listed in Attachment A and for any additional

sites identified in Verizon's response to Information Request No. 19(c). If Verizon contends that the applicable tariff has changed since the first effective date of any collocation site (as identified in Information Request No. 19(d)), please provide each such tariff language applicable to such collocation site(s) and the dates of applicability;

- r) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), please state whether Verizon provided a written document to AT&T, prior to any bill, which notified AT&T of the amount Verizon intended to charge AT&T for DC Power provided.

REPLY:

- a) Verizon disagrees that this list identifies each and every collocation site subject to the terms of the intrastate tariff.
- b) Verizon believes that the following collocation sites listed in Proprietary Attachment A are not subject to terms of the intrastate tariff.
- c) Verizon believes that the following additional collocation sites listed in Proprietary Attachment B are subject to the intrastate tariff.
- d) Verizon objects to this request on the ground that the requested information is available to AT&T from its own records and for Verizon to develop the information would be unduly burdensome.
- e) See Proprietary Attachment C.
- f) See Proprietary Attachment D.
- g) Verizon objects to this request on the ground that the requested information is available to AT&T from its own records and for Verizon to develop the information would be unduly burdensome.

REPLY ATT/Covad 1-19
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- h) Verizon objects to this request on the ground that the requested information is available to AT&T from its own records and for Verizon to develop the information would be unduly burdensome.
- i) Verizon objects to this request on the ground that the requested information is available to AT&T from its own records and for Verizon to develop the information would be unduly burdensome.
- j) Verizon objects to this request on the ground that the requested information is available to AT&T from its own records and for Verizon to develop the information would be unduly burdensome.
- k) Verizon objects to this request on the ground that the requested information is available to AT&T from its own records and for Verizon to develop the information would be unduly burdensome.
- l) Verizon objects to this request on the ground that the requested information is available to AT&T from its own records and for Verizon to develop the information would be unduly burdensome.
- m) Verizon objects to this request on the ground that the requested information is available to AT&T from its own records and for Verizon to develop the information would be unduly burdensome.
- n) Verizon objects to this request on the ground that the requested information is available to AT&T from its own records and for Verizon to develop the information would be unduly burdensome.
- o) Verizon objects to this request on the ground that the requested information is available to AT&T from its own records and for Verizon to develop the information would be unduly burdensome.

REPLY ATT/Covad 1-19
Con't:

- p) Verizon objects to this request on the ground that the requested information is available to AT&T from its own records and for Verizon to develop the information would be unduly burdensome.
- q) The tariff language applicable to billing for DC power at collocation sites throughout the entire state of Massachusetts are located in DTE -MA- Tariff No.17 and DTE -MA- Tariff No.15. The date the tariff became effective is located on the bottom, left side of the page.

References to collocation DC power in DTE -MA- Tariff No.17 are located in Part E, Sections 2, 3, 6, 9, and 11 and Part M, Section 5. **Attachment 1** contains those current effective tariffs. **Attachment 2** contains any superseded tariff pages associated with those tariff sections since DTE -MA- Tariff No.17 was originally introduced.

References to collocation DC power in DTE -MA- Tariff No. 15 are located in Section 16 and Section 30 (Pages 58 and 59). **Attachment 3** contains those current effective tariffs. **Attachment 4** contains any superseded tariff pages associated with those tariff sections since DTE MA No.15 was originally introduced.

- r) Verizon did not provide AT&T with a document prior to billing.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-39

Respondent: Lynelle J. Reney
Title: Director

REQUEST: AT&T Communications of New England & Covad Communications, Inc., Set #1

DATED: June 6, 2001

ITEM: ATT/Covad 1-21 Describe in detail the Verizon organization, including personnel and operating and communication procedures, for receiving applications for DC power, billing for such power and implementing such power delivery to collocation sites.

REPLY: The organization responsible for receiving, processing, distributing and billing the CLEC request for DC power is the Verizon Infrastructure Program Management group. In addition to this organization several others are involved in the actual implementation or delivery of DC power to the collocation arrangement. These include Power, Space and Frame, Customer Network Engineering, and Network Operations. These organizations contain hundreds of individuals and detailing each individual and each process would be unduly burdensome.